

Exhibit 29
Filed Under Seal

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

---o0o---

GOOGLE LLC,)
)
Plaintiff,) Case No.
) 3:20-cv-06754-WHA
vs.) Related to CASE No.
) 3:21-cv-07559-WHA
SONOS, INC.,)
)
Defendants.)
_____)

---o0o---

Videotaped Zoom Deposition of
ALLISON ELLIOTT
Highly Confidential - Attorney's Eyes Only
Friday, May 27, 2022

---o0o---

Veritext Job No.: 5251903
Katy E. Schmidt
RPR, RMR, CRR, CSR 13096

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

1 BY MS. MA: 11:32	1 Q. Do you recall where? 11:35
2 Q. Do you know who was working on Sonos' 11:32	2 A. It was in a number of different buildings. 11:35
3 Cloud Queue APIs? 11:32	3 It wasn't in one location. 11:35
4 A. I think Tad was working on Sonos' 11:32	4 Q. Was the partner summit open to the public? 11:35
5 Cloud Queue -- was working on APIs having to do with 11:32	5 A. No. 11:35
6 Cloud Queues, and I believe Daniel Casimiroff was 11:32	6 Q. Was it invitation only? 11:35
7 working on that. But those are the only two I remember 11:32	7 A. Yes. 11:35
8 specifically. 11:32	8 Q. Does Sonos invite partners to attend the 11:35
9 Q. Can you spell Daniel's last name? 11:32	9 summit? 11:35
10 A. C-a-s-i-m-i-r-o-f-f. I don't remember exactly 11:32	10 A. Yes. 11:35
11 how his last name was spelled. 11:33	11 Q. Do you know how Sonos determined who was 11:35
12 Q. No worries. Appreciate the effort. 11:33	12 invited to the partners summit? 11:35
13 Do you know if Sonos ever told Google it was 11:33	13 A. I don't think there was like a specific 11:35
14 building APIs that used Cloud Queue? 11:33	14 framework that Sonos used to decide who should be 11:35
15 A. I don't know that. 11:33	15 invited. 11:36
16 Q. Do you know if Sonos told anything about its 11:33	16 Q. Do you recall which partners were invited? 11:36
17 Cloud Queue APIs to Google? 11:33	17 A. I can't give you a full list, but I know 11:36
18 A. I wasn't part of the conversations at that 11:33	18 that -- I know that Google was invited. I know that 11:36
19 time, so I don't know. 11:33	19 Apple was invited. Pandora, Sirius XM, Spotify. I 11:36
20 Q. Back to the e-mail. 11:33	20 believe SoundCloud was there, and Rhapsody. Title as 11:36
21 Your e-mail continues, "This was a big topic 11:33	21 well. 11:36
22 of discussion at our partner summit last year." 11:33	22 Q. Do you recall if all the partners you just 11:36
23 Do you see that? 11:33	23 listed actually attended the summit? 11:36
24 A. Yes. 11:33	24 A. No. I don't know if all of those people 11:36
25 Q. And by "this," you're still referencing 11:33	25 attended. 11:36
Page 78	Page 80
1 Sonos' development of APIs that would allow direct 11:33	1 Q. Do you recall if anyone from Google attended 11:36
2 playback; correct? 11:33	2 the summit? 11:36
3 A. Yes. 11:34	3 A. Yes. Google attended. 11:36
4 Q. What is the partner summit that you reference 11:34	4 Q. Do you recall who from Google attended? 11:36
5 here? 11:34	5 A. The only person I remember from Google is 11:37
6 A. Sonos has a summit in Santa Barbara where we 11:34	6 Chris Bunch. I believe there were others there, though, 11:37
7 invited a lot of the music partners to come and attend 11:34	7 but I don't remember who they were. 11:37
8 and review, like, sort of Sonos' vision for being able 11:34	8 Q. Were members of the press invited to the 11:37
9 to play all music to Sonos speakers, from both the 11:34	9 summit? 11:37
10 Sonos app and from partner applications, and then also 11:34	10 A. Not that I recall. 11:37
11 just kind of threw a nice party for the partners. 11:34	11 Q. Did you attend the summit? 11:37
12 Q. So the partner summit was something Sonos 11:34	12 A. Yes. 11:37
13 hosted? 11:34	13 Q. When did the summit occur? 11:37
14 A. Yes. It was hosted by Sonos. 11:34	14 A. Oh, boy. 11:37
15 Q. And what was the purpose of the summit? 11:34	15 Well, I guess it occurred in 2015. 11:37
16 A. The purpose of the summit was to share Sonos' 11:34	16 Q. Do you recall anything further? Month? 11:37
17 vision for play all and being able to play all music to 11:34	17 A. I have no idea what month it was in 2015. 11:37
18 Sonos speakers. 11:34	18 Q. What was the format of the partner summit? 11:37
19 Q. What does the term "play all" refer to? 11:35	19 A. I think that there were presentations that 11:38
20 A. The idea that a customer of Sonos should be 11:35	20 were given that all the partners were invited to attend, 11:38
21 able to play their music regardless of what music 11:35	21 and then there were breakout meetings with specific 11:38
22 service they use to a Sonos speaker. 11:35	22 partners, and then there were -- there were a couple 11:38
23 Q. This summit took place in person in 11:35	23 nightly dinners. 11:38
24 Santa Barbara; correct? 11:35	24 Q. Was the summit more than one day? 11:38
25 A. Yes. 11:35	25 A. I think it was like two days or maybe, like, 11:38
Page 79	Page 81

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

1 A. Yes. 12:48	1 have been shared towards the beginning of the 12:51
2 Q. There's an attachment with the title 12:48	2 integration, the direct control integration; correct? 12:52
3 "Pandora API Control Slides." 12:48	3 A. Yes. 12:52
4 Do you see that? 12:48	4 Q. Do you know if there were any other 12:52
5 A. Yes. 12:48	5 presentations that were shown to Pandora throughout the 12:52
6 Q. Do you know why Mr. Corbin was sending you 12:48	6 partnership? 12:52
7 this presentation? 12:48	7 A. Yes. There were definitely other 12:52
8 A. I think because we were working with Pandora 12:48	8 presentations shown to Pandora. 12:52
9 at that point on the integration for direct control from 12:48	9 Q. I'd like to -- actually, before that, what 12:52
10 the Pandora app. 12:49	10 was the purpose of this presentation? 12:52
11 Q. Let's take a look at the next page, which is 12:49	11 A. The purpose of this presentation first is to 12:52
12 the actual attachment. 12:49	12 explain to Pandora how we are proposing to add a new 12:52
13 Do you recognize this presentation? 12:49	13 API to SMAPI in order to support free radio. 12:52
14 It's a bit longer so feel free to scroll 12:49	14 Sonos didn't have a good way to support 12:52
15 through the whole thing. 12:49	15 Pandora's radio model with ads. So this is a new API 12:52
16 A. Yes. 12:49	16 for SMAPI that supports the radio model with ads. 12:53
17 Q. Were you involved in the creation of this 12:49	17 So that's what the first several slides are 12:53
18 presentation? 12:49	18 about -- that say "free radio enhancement," and then 12:53
19 A. Yes. I think I worked with Keith on this. 12:49	19 there's the slides with the remaining gaps is just 12:53
20 Yes. 12:50	20 what -- you know, which functionality from the 12:53
21 Q. Do you remember what parts of this 12:50	21 Pandora app still won't be supported in SMAPI. 12:53
22 presentation you contributed to? 12:50	22 The Sonos control API, this appears to just be 12:53
23 A. I would have created probably the -- I 12:50	23 an overview for Pandora of what we're proposing to build 12:53
24 wouldn't -- I would not have created any of the 12:50	24 on the developer platform with, you know, what's 12:53
25 diagrams. Like someone in engineering would have been 12:50	25 supported now versus what's coming. And that's what the 12:53
Page 106	Page 108
1 responsible for the diagrams. 12:50	1 second half of the presentation is. 12:53
2 I am -- was probably responsible for -- I was 12:50	2 Q. I'd like to direct your attention to page 24 12:53
3 definitely responsible for the -- the slides that are 12:50	3 of the document. 12:53
4 black basically, the remaining gap slide, as well as the 12:50	4 A. Sorry. One second. Scrolling. 12:54
5 slide describing the get radio segment API. 12:50	5 MS. BRODY: Jocelyn, is page 24 the number 12:54
6 Q. Was this presentation shared with Pandora? 12:50	6 page or the .pdf page? Just so I can turn to the right 12:54
7 A. Yes, I believe so. 12:50	7 page as well. 12:54
8 Q. And then what were the circumstances 12:50	8 MS. MA: The .pdf page ending in Bates -- with 12:54
9 surrounding Sonos sharing this presentation with 12:50	9 a Bates stamp ending 361. 12:54
10 Pandora? 12:51	10 MS. BRODY: Thank you. 12:54
11 A. Starting the integration. So the project that 12:51	11 BY MS. MA: 12:54
12 I mentioned for direct control and also integrating 12:51	12 Q. Do you see this is a title page that says 12:54
13 Pandora premium, as well as, like, moving Pandora from 12:51	13 "Sonos Cloud Queue API"? 12:54
14 off of the player, that would have been -- it would have 12:51	14 A. Yeah. 12:54
15 been the kickoff of that project. 12:51	15 Q. Does this refer to a set of APIs? 12:54
16 Not the kickoff. Sorry. Excuse me. Like 12:51	16 A. Yes. This is referring to a set of APIs. 12:54
17 towards the beginning of that project. 12:51	17 Q. And do you know what functionality this set of 12:54
18 Q. Was this presentation shared at a meeting 12:51	18 APIs support? 12:54
19 between Pandora and Sonos? 12:51	19 A. It's referring to the set of APIs that support 12:54
20 A. Yes. I don't know if it was an in-person 12:51	20 playback versus -- playback actions. So the actual, 12:54
21 meeting or a call, but... 12:51	21 like, making music play on the player versus the control 12:55
22 Q. Were you present when it was shared with 12:51	22 actions which are stop, go, skip. 12:55
23 Pandora? 12:51	23 Q. On the next page there's one of those graphics 12:55
24 A. I don't actually remember that. 12:51	24 that I think you were referring to. 12:55
25 Q. You said this was a presentation that would 12:51	25 A. Mm-hm. 12:55
Page 107	Page 109

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

<p>1 Q. And do you see that the title of this slide is 12:55</p> <p>2 also "Sonos Cloud Queue API"? 12:55</p> <p>3 A. Yes. 12:55</p> <p>4 Q. Were you involved in creating this graphic? 12:55</p> <p>5 A. No. I did not create the graphic. 12:55</p> <p>6 Q. Do you know if the architecture depicted in 12:55</p> <p>7 this graphic is ultimately what was used in the direct 12:55</p> <p>8 playback of Pandora on Sonos speakers? 12:55</p> <p>9 A. I do not remember if this accurately 12:55</p> <p>10 represents what the final implementation was. Because I 12:55</p> <p>11 honestly don't remember all of the details of the final 12:55</p> <p>12 implementation. 12:56</p> <p>13 Q. Do you recall if a Cloud Queue API was used in 12:56</p> <p>14 the final implementation? 12:56</p> <p>15 A. Cloud Queues were used for Pandora, yes. 12:56</p> <p>16 Q. There's a graphic of what looks like a phone 12:56</p> <p>17 labeled "Your App." 12:56</p> <p>18 Do you see that? 12:56</p> <p>19 A. Yes. 12:56</p> <p>20 Q. And that signifies the music app itself; 12:56</p> <p>21 right? So in this case Pandora's music app? 12:56</p> <p>22 A. Yes. 12:56</p> <p>23 Q. And next to it is a graphic labeled 12:56</p> <p>24 "Sonos Player." 12:56</p> <p>25 Do you see that? 12:56</p> <p style="text-align: right;">Page 110</p>	<p>1 Do you see that? 12:57</p> <p>2 A. Yes. 12:57</p> <p>3 Q. What is "SSDP"? 12:57</p> <p>4 A. I think SSDP is an over-the-air communication 12:57</p> <p>5 protocol, but I know zero details about it. 12:57</p> <p>6 Q. Do you know what functionality it allowed for? 12:57</p> <p>7 A. I don't. 12:58</p> <p>8 Q. There's another double-sided arrow between the 12:58</p> <p>9 "Sonos" Speaker and the "Cloud Queue Server." 12:58</p> <p>10 Do you see that? 12:58</p> <p>11 A. Yes. 12:58</p> <p>12 Q. And that's labeled the "Cloud Queue API" -- 12:58</p> <p>13 A. Yes. 12:58</p> <p>14 Q. -- correct? 12:58</p> <p>15 A. Yes. 12:58</p> <p>16 Q. Does that refer to the Cloud Queue API that 12:58</p> <p>17 Sonos developed? 12:58</p> <p>18 A. Yes. 12:58</p> <p>19 Q. And do you know if that's a set of APIs? 12:58</p> <p>20 A. Yeah. That's the set of APIs for playback. 12:58</p> <p>21 Q. And did that -- strike that. 12:58</p> <p>22 When you say it was the API that allowed for 12:58</p> <p>23 playback, did it allow for playback using queues in the 12:58</p> <p>24 Cloud? 12:58</p> <p>25 A. Yes. 12:58</p> <p style="text-align: right;">Page 112</p>
<p>1 A. Yes. 12:56</p> <p>2 Q. And that's meant to indicate a Sonos speaker; 12:56</p> <p>3 correct? 12:56</p> <p>4 A. Yes. 12:56</p> <p>5 Q. And between the "Your App" graphic and the 12:56</p> <p>6 "Sonos Player" graphic, there's a two-way arrow labeled 12:56</p> <p>7 "Control API." 12:56</p> <p>8 Do you see that? 12:56</p> <p>9 A. Yes. 12:56</p> <p>10 Q. So does that represent the APIs that Sonos 12:56</p> <p>11 built that allowed for control functionalities? 12:56</p> <p>12 A. Yes. 12:57</p> <p>13 Q. And were those control APIs available to 12:57</p> <p>14 developers who wanted to implement direct playback onto 12:57</p> <p>15 Sonos speakers? 12:57</p> <p>16 MS. BRODY: Objection to form. 12:57</p> <p>17 THE WITNESS: Yeah. I don't remember exactly 12:57</p> <p>18 when they became available or even if they were publicly 12:57</p> <p>19 available outside of the invitation only program. 12:57</p> <p>20 BY MS. MA: 12:57</p> <p>21 Q. But were they available to Music Partners that 12:57</p> <p>22 Sonos worked with on direct playback? 12:57</p> <p>23 A. Yes. 12:57</p> <p>24 Q. There's also a double-sided arrow between 12:57</p> <p>25 "Your App" and "Sonos Player" labeled "SSDP." 12:57</p> <p style="text-align: right;">Page 111</p>	<p>1 Q. The last page I want to look at is 31, which 12:59</p> <p>2 is slide 30, and that is the page with the Bates stamp 12:59</p> <p>3 ending in 368. 12:59</p> <p>4 Are you there? 12:59</p> <p>5 A. Yes, I'm there. 12:59</p> <p>6 Q. And this slide is also titled 12:59</p> <p>7 "Sonos Cloud Queue API." 12:59</p> <p>8 Do you see that? 12:59</p> <p>9 A. Yes. 12:59</p> <p>10 Q. The subheading is "Cloud Queue APIs" with 12:59</p> <p>11 three bullets. 12:59</p> <p>12 Do you see that? 12:59</p> <p>13 A. Yes. 12:59</p> <p>14 Q. And the first bullet is "GET slash version." 12:59</p> <p>15 Do you see that? 12:59</p> <p>16 A. Yes. 12:59</p> <p>17 Q. What functionality does this API allow for? 12:59</p> <p>18 A. It allows the partner to tell Sonos which 12:59</p> <p>19 version of the Cloud Queue API they're using. 12:59</p> <p>20 Q. How many versions of the Cloud Queue API were 01:00</p> <p>21 there? 01:00</p> <p>22 A. I have no idea. 01:00</p> <p>23 Q. Were there more than five? 01:00</p> <p>24 A. That one, I have no idea. 01:00</p> <p>25 Q. But you knew that there was multiple versions? 01:00</p> <p style="text-align: right;">Page 113</p>